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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

PERFECT 10, INC., a California  
corporation,

Plaintiff,

v.

RAPIDSHARE A.G., a corporation;  
and DOES 1 through 100, inclusive,

Defendants.

CASE NO. 09 CV 2596 H (WMC)

**RESPONSE OF PLAINTIFF  
PERFECT 10, INC. TO STATUS  
REPORT SUBMITTED BY  
DEFENDANT RAPIDSHARE AG  
(DOCKET NO. 80) REGARDING  
MEET AND CONFER REQUIRED BY  
THIS COURT'S ORDER DATED MAY  
12, 2010 (DOCKET NO. 61)**

DEMAND FOR JURY TRIAL  
Judge: Honorable Marilyn L. Huff  
Courtroom: 13  
Date Filed: November 18, 2009  
Trial Date: None Set

Plaintiff Perfect 10, Inc. (“Perfect 10”) submits the following Response to the Status Report filed by Defendant RapidShare AG (“RapidShare”) at 12:21 a.m. on Saturday morning, June 12, 2010 (Docket No. 80) (the “RapidShare Report”). Perfect 10 is forced to file this separate Response because RapidShare refused to include the sections submitted by Perfect 10 in a Joint Status Report filed with the Court. Instead, RapidShare unilaterally submitted the RapidShare Report without any proposed language from Perfect 10, even though this Court’s May 12, 2010 Order (Docket No. 61) neither requires the parties to file a Status Report nor sets a deadline by which any such report must be filed.

**I. Statement Regarding Additional Measures Taken By Perfect 10.**

This Court issued its Order requiring the parties to meet and confer on May 12, 2010. One week later, on May 19, 2010, the International Anti-Piracy Caucus of the United States Congress, a caucus made up of 70 members of Congress and chaired by Senators Orrin Hatch (R-Utah) and Sheldon Whitehouse (D-RI) and Congressmen Bob Goodlatte (R-Va.) and Adam Schiff (D-Cal.), issued its 2010 International Piracy Watch List (the “Congressional Anti-Piracy Report”). *This report identifies RapidShare as one of the six worst pirate websites in the world.* In a press release discussing the report, the Recording Industry Association of America stated that RapidShare was one of the “leading sources of illegal music and operate[s] with the clear purpose of encouraging and inducing theft.” At a press conference discussing the issuance of the report, Senator Whitehouse stated that “[t]he United States has been on the losing end of the largest theft of intellectual property in history. This must be stopped, and soon.” Congressman Schiff added that “we must ensure that our artists, creators and producers *are paid for their work.*” (emphasis added.) The findings and analysis set forth in the Congressional Anti-Piracy Report are directly contrary to RapidShare’s assertion that it should be permitted to sell access to billions of dollars of copyrighted works of intellectual property that RapidShare does not own, without compensating the rightful owners. Copies of press releases from the International

1 Anti-Piracy Caucus and the Recording Industry Association of America regarding the  
2 issuance of the Congressional Anti-Piracy Report are attached hereto as Exhibit 1.

3 Perfect 10 has brought the Congressional Anti-Piracy Report to RapidShare's  
4 attention and has identified to RapidShare hundreds of movies, songs, and other  
5 intellectual property found on RapidShare's servers that RapidShare is offering to its  
6 users without authorization from, or payment to, the rightful owners of these works.  
7 RapidShare has refused to stop offering such obviously pirated materials to its users.

8 In addition, since this Court issued its Order on May 12, 2010, Perfect 10 has  
9 spent many hours: (i) finding files on Rapidshare's servers that are infringing Perfect  
10 10's copyrighted images ("P10 Images"); and (ii) sending to RapidShare four notices  
11 under the Digital Millennium Copyright Act (the "DMCA") that collectively identify  
12 more than 1,800 files stored on RapidShare's servers that are infringing P10 Images.  
13 Each of these files typically contains approximately 50 copyrighted P10 Images.  
14 Consequently, RapidShare has copied, sold access to, and otherwise distributed,  
15 without authorization, at least 90,000 copies of P10 Images to multiple RapidShare  
16 users – essentially Perfect 10's entire library. Copies of these four DMCA notices are  
17 attached hereto collectively as Exhibit 2.

18 Perfect 10 has spent many hours creating DMCA notices to send to RapidShare,  
19 even though it has explained to RapidShare that simply blocking a particular  
20 RapidShare download link (also known as a RapidShare file name) will not prevent the  
21 same infringing images from reappearing over and over within different file names on  
22 RapidShare's servers. RapidShare's ineffective hash filter will not prevent the same  
23 image from being uploaded to RapidShare within a file that has a slightly different  
24 name. Perfect 10 has also asked RapidShare to provide Perfect 10 with the names of  
25 the persons or entities that have uploaded infringing P10 Images identified in Perfect  
26 10's DMCA notices onto RapidShare's servers. RapidShare has refused to provide  
27 Perfect 10 with this information. In addition, RapidShare has not offered to  
28 compensate Perfect 10 in any way for the unauthorized use of P10 Images, even

1 though the presence of these images on RapidShare's servers enhances RapidShare's  
2 revenues and destroys what is left of Perfect 10's business. Nor has RapidShare taken  
3 any steps to prevent the same infringing P10 Images from being repeatedly uploaded to  
4 RapidShare's servers and offered to RapidShare users.

5 In addition to sending four DMCA notices to RapidShare since May 12, 2010,  
6 Perfect 10 has also sent to RapidShare: (i) five notices identifying images found on  
7 RapidShare's servers that violate Perfect 10's rights of publicity; and (ii) five "unfair  
8 competition" notices identifying infringing third-party materials found on  
9 RapidShare's servers, including movies, songs, and images, that Perfect 10 believes are  
10 not authorized by the copyright owners. RapidShare has refused to stop offering to its  
11 users any of the obviously pirated works identified in these notices. Although  
12 RapidShare has removed a few copies of certain infringing movies and songs from its  
13 servers, it continues to offer other pirated copies of those same works in other  
14 RapidShare files on its servers.

15 Perfect 10 has also contacted image recognition service providers to determine  
16 whether it would be feasible for these companies to provide Image Recognition  
17 services to RapidShare. Use of image recognition technology would prevent the same  
18 infringing P10 Images (as well as images owned by other copyright holders) from  
19 being uploaded to RapidShare's servers over and over again. All of these providers  
20 have stated that their technology could employed by RapidShare to stop the same  
21 infringing image from being repeatedly offered by RapidShare to its users. One such  
22 provider, Attributor, has submitted a proposal to provide such services for a specific  
23 price. Perfect 10 has forwarded Attributor's proposal to RapidShare. As of this date,  
24 however, RapidShare has taken no steps to implement Image Recognition. *See also*  
25 Section IV, below.

## 26 **II. Perfect 10's Position Regarding Takedown Notices.**

27 RapidShare is but one of hundreds of paysites that have made copies of, and sold  
28 access to, thousands of P10 Images without authorization. In essence, RapidShare's

1 proposal regarding takedown notices would require Perfect 10 and other copyright  
2 holders to: (i) pay to join the paysites that are infringing their copyrighted works;  
3 (ii) spend thousands of hours searching through those paysites to locate the massive  
4 quantities of infringing materials found on those websites; and (iii) spend thousands of  
5 additional hours submitting an unending stream of DMCA notices, which will not even  
6 prevent those websites from selling the same exact infringing images again and again.  
7 This approach is contrary to that of the Congressional Anti-Piracy Report discussed  
8 above, which makes clear that RapidShare should be required to compensate Perfect 10  
9 for its use of copyrighted P10 Images. Absent any agreement with Perfect 10,  
10 RapidShare should not be allowed to sell access to any of the copyrighted intellectual  
11 property owned by Perfect 10.

12 As noted above, submitting DMCA notices to RapidShare that merely identify  
13 RapidShare downloading links (also known as RapidShare file names) does not solve  
14 the basic problem that the same infringing P10 Images continue to reappear at different  
15 locations on RapidShare's servers. For this reason, at the very minimum, RapidShare  
16 needs to employ Image Recognition or some other appropriate technology that allows  
17 RapidShare to remove infringing P10 Images from its servers and block such images  
18 from ever reappearing on RapidShare's servers. The hash filter that RapidShare states  
19 that it employs will only block the exact same file with the exact same file name. It  
20 will not block any of the images contained within that file from reappearing on  
21 RapidShare's servers inside a RapidShare file with a different file name.

22 The RapidShare Report misrepresents both the effectiveness of its hash filter and  
23 Perfect 10's comments about the hash filter. RapidShare asserts that Perfect 10's  
24 statement that "RapidShare's hash filter will do nothing to prevent *the same work* from  
25 being infringed at other locations" is false." RapidShare Report at 4-5, n.2 (emphasis  
26 added). In fact, it is RapidShare's own statement that is false. Indeed, in the very next  
27 sentence, the RapidShare Report concedes that its hash filter only "prevents subsequent  
28 uploads *of the same file.*" *Id.* (emphasis added). RapidShare's attempt to confuse the

1 Court by switching between the words “work” and “file” as if they are synonymous  
2 should not succeed. As RapidShare admits, its hash filter, at most, can only prevent  
3 the uploading of the exact same *file*. It cannot prevent the uploading of the exact same  
4 *work* in a different file, even if the file is only very slightly different. For example,  
5 files containing the exact same P10 Image uploaded by two different individuals or  
6 created on two different scanners or computers would have different hash values, and  
7 thus would not be blocked by RapidShare’s hash filter.

8 RapidShare’s assertion that Perfect 10 never raised the issue of the inadequacy  
9 of its hash filter during the meet and confer process [*see* RapidShare Report at 4-5 n.2]  
10 is also incorrect. Perfect 10 extensively discussed with RapidShare the need for  
11 RapidShare to begin using image recognition technology to block the same infringing  
12 works from repeatedly reappearing on RapidShare’s servers specifically because of the  
13 inadequacy of RapidShare’s hash filter and the inability of the filter to prevent the  
14 uploading of the same infringing work.

### 15 **III. Perfect 10’s Position Regarding RapidShare’s Takedown Tool.**

16 Perfect 10 has not agreed to the contract to use RapidShare’s takedown tool that  
17 RapidShare has proposed, because RapidShare’s proposed contract effectively  
18 exonerates RapidShare from any wrongdoing. For example, the original contract  
19 proposed by RapidShare to Perfect 10 required Perfect 10 to make various admissions  
20 that Perfect 10 believed were not true, including that RapidShare had made  
21 “tremendous efforts in order to prevent the . . . spread of Illegal Files.”

22 Perfect 10 could not possibly sign an agreement containing such self-serving  
23 statements. Instead, Perfect 10 proposed a reasonable agreement to use RapidShare’s  
24 takedown tool, which was rejected by RapidShare. Consequently, Perfect 10 elected to  
25 send additional DMCA notices to RapidShare. Under the DMCA, RapidShare is  
26 supposed to notify the alleged infringers identified in Perfect 10’s notices, to give those  
27 alleged infringers the opportunity to provide counter-notifications to Perfect 10,  
28 demonstrating that they are authorized to upload the P10 Images identified in Perfect



1 10's notices. However, Perfect 10 has not received any counter-notifications in  
2 response to its DMCA notices. The lack of such counter-notifications further supports  
3 Perfect 10's contentions that virtually all of the intellectual property available on  
4 RapidShare's servers is infringing and that RapidShare, and not third parties, has  
5 uploaded much of the infringing P10 material found on RapidShare's servers.

6 **IV. Perfect 10's Position Regarding Image Recognition Technology.**

7 As noted in Section I, above, Perfect 10 has discussed the feasibility of  
8 RapidShare using an image recognition service provider to locate and block access to  
9 infringing images with three such service providers – Attributor, TinEye, and PicScout.  
10 All three service providers have advised Perfect 10 that they could provide such  
11 services to RapidShare, and that the issues that RapidShare has raised (such as files  
12 being stored in .RAR format) can be handled by their technology. Perfect 10's counsel  
13 has passed along this information to RapidShare's counsel. Apparently, the only  
14 action that RapidShare has taken in response is to set up a conference call with  
15 Attributor's CTO. RapidShare Report at 5.

16 The use of image recognition technology is a simple measure that RapidShare  
17 could implement to reduce infringements on its servers. Nevertheless, RapidShare has  
18 taken no steps to implement image recognition. In addition, as far as Perfect 10 is  
19 aware, RapidShare has taken no steps to implement filtering systems for other types of  
20 copyrighted works, such as the music filtering system used by Veoh.

21 RapidShare can do vastly more to eliminate infringement on its system. For  
22 example, RapidShare could install a filtering system to block any major movie, song,  
23 or computer program from being uploaded to RapidShare's servers. Such a system  
24 would cause anyone who seeks to upload a file containing such terms as "Microsoft,"  
25 "Rolling Stones," or "CSI Miami" to receive a prompt requiring that person to contact  
26 RapidShare to prove that he or she owns the rights to the material. By contrast, as  
27 explained in Section III, above, simply using a hash filter only blocks a particular  
28 infringing work from being stored at a particular location on RapidShare's servers.

1 RapidShare's hash filter will do nothing to prevent that same work from being  
2 infringed at other locations on RapidShare's servers.

3 Perfect 10 cannot use these image recognition services in the same manner as  
4 RapidShare because Perfect 10 does not have access to RapidShare's servers. All three  
5 of the image recognition providers with whom Perfect 10 has spoken have stated that  
6 they must have access to RapidShare's servers in order to find all infringing images on  
7 the servers. Furthermore, Perfect 10, which has been the victim of massive theft and  
8 sale of its intellectual property by RapidShare, should not be required to spend tens of  
9 thousands of dollars locating that property among the millions of infringing files on  
10 RapidShare's servers.

11 **V. Perfect 10's Position Regarding Identification Of Works.**

12 RapidShare's assertion that Perfect 10 does not own the copyrights to the P10  
13 Images at issue in this action [RapidShare Report at 6] is simply incorrect. Perfect 10  
14 owns the copyrights for every P10 Image for which it has given notice to RapidShare,  
15 and for every P10 Image which has been raised in the Complaint and the PI Motion.  
16 RapidShare has misconstrued what Perfect 10 has stated. Perfect 10 has merely noted  
17 that some Perfect 10 models have taken photographs for other magazines and some  
18 Perfect 10 models have been allowed to use their images on their own websites. This  
19 issue is irrelevant, however, because *RapidShare does not have the right to sell or*  
20 *distribute any of these images.*

21 There is a simple solution to the problem raised by RapidShare. As the  
22 Congressional Anti-Piracy Report recently emphasized, copyright holders must be paid  
23 for their work. Accordingly, RapidShare should not be selling access to any  
24 intellectual property, including P10 Images, that RapidShare has no authorization to  
25 sell. Only RapidShare knows what copyrighted works it has the right to sell, and  
26 RapidShare should sell only access to that material.

27 Finally, RapidShare continues to mischaracterize Perfect 10's website as a "porn  
28 site." RapidShare Report at 6. The pot should not call the kettle black. Posts in blogs



1 have stated that RapidShare is “90% porn.” Moreover, when the RapidShare search  
 2 engine, filestube.com, is used to search for RapidShare files offering “porn,” it returns  
 3 **370,000** RapidShare files. In comparison, a similar search on “George Bush” returns  
 4 only three RapidShare files.

5 **VI. Perfect 10’s Position Regarding Search Terms And Sites.**

6 RapidShare’s assertion that Perfect 10 has not provided RapidShare with a list of  
 7 search terms and sites that it found most useful in locating links on third party sites to  
 8 material stored on RapidShare, so that RapidShare itself could proactively search these  
 9 sites [RapidShare Report at 6], is completely incorrect. First, the four DMCA notices,  
 10 five “rights of publicity” notices, and five “unfair competition” notices sent by Perfect  
 11 10 to RapidShare [see Section I, above] contain both the search terms used by Perfect  
 12 10 and long lists of infringing websites. See Perfect 10’s DMCA notices attached as  
 13 Exhibit 2 hereto. Second, Perfect 10 provided RapidShare with the search terms it has  
 14 used in two separate folders found in the evidentiary disks submitted by Perfect 10 in  
 15 connection with its motion for a preliminary injunction (the “PI Motion”): (i) the folder  
 16 labeled “Evidence of downloads” found on the disk submitted as Exhibit 11 to the  
 17 Declaration of Dr. Norman Zada in support of the PI Motion; and (ii) the folder labeled  
 18 “Evidence of Perfect 10 downloads” found on the disk submitted as Exhibit 28 to the  
 19 Reply Declaration of Dr. Norman Zada in support of the PI Motion. Third, Perfect 10  
 20 has informed RapidShare that it has simply searched on its model names and on  
 21 Perfect 10. In any event, RapidShare is much more likely than Perfect 10 to know  
 22 where infringing P10 Images are located on RapidShare’s servers. Finally, RapidShare  
 23 could avoid this entire issue simply by removing all infringing P10 Images, and other  
 24 intellectual property for which it has no rights, from RapidShare’s servers.

25 DATED: June 13, 2010

Respectfully submitted,  
 LAW OFFICES OF JEFFREY N. MAUSNER

By: David N. Schultz

David N. Schultz


Attorneys for Plaintiff Perfect 10, Inc.

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# Exhibit 1



# United States Senator Orrin G. Hatch

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## News Room

The Senator's Press Releases

May 19th, 2010 Media Contact(s): Mark Eddington and Antonia Ferrier. (202) 224-5251

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### HATCH, INTERNATIONAL ANTI-PIRACY CAUCUS UNVEILS "2010 INTERNATIONAL PIRACY WATCH LIST"

**Canada, China, Mexico, Russia and Spain Top List; Costing U.S. Billions**

WASHINGTON - At a press conference today, Senators Orrin Hatch (R-UT) and Sheldon Whitehouse (D-RI), and Congressmen Adam Schiff (D-CA) and Bob Goodlatte (R-VA), Chairs of the Congressional International Anti-Piracy Caucus, unveiled the "2010 International Piracy Watch List," a report of those nations where **copyright piracy has reach alarming levels costing the U.S. billions.** Topping the list in this second annual report are China, Russia, Canada, Spain, and Mexico.

"Our nation and our economy is what it is today, because of the ingenuity and ideas of our people - ideas that have been safeguarded through strong intellectual property rights protections. But, as the 2010 Watch List report makes clear, those very ideas are increasingly at risk from piracy and counterfeiting abroad," said Senator Hatch. "What is stunning is that piracy isn't just emanating from countries like Russia and China, but also from Canada and Mexico, our largest trading partners. Now is the time for policymakers to come together to tackle this global threat that cripples economic growth and stifles the innovation that has made our nation great."

"International piracy of American intellectual property weakens a segment of our economy that long has supported innovation and great American jobs," said Senator Whitehouse. "Congress must work on a bipartisan basis to protect the creative industries and the jobs they support. **The United States has been on the losing end of the largest theft of intellectual property in history. This must be stopped, and soon.**"

"**Intellectual property must be protected if our economy is to thrive** -- and enforcing these protections does not stop at the water's edge," said Congressman Adam Schiff. "American entrepreneurs invest their time, money and sweat into creating the next must-have music, film and technology, and justly expect to be compensated by the market. To assure the continued creation and distribution of music, movies, software and books, from which we all benefit, **we must ensure that our artists, creators and producers are paid for their work**, and take much stronger action to ensure countries on the anti-piracy watch list are forced to take piracy seriously."

"It is tempting to think of crimes involving piracy, or intellectual property theft, as victimless, but this is simply untrue. Piracy denies individuals who have invested in the creation and production of these goods a return on their investment thus reducing the incentive to invest in innovative products and new creative works," Congressman Goodlatte said. "The end result is the loss of billions of dollars in revenue for the U.S. each year and even greater losses to the U.S. economy in terms of reduced job growth and exports. Not only is the problem of piracy plaguing U.S. creators but it has become a global epidemic. We must encourage other countries to enact and enforce strong intellectual property laws in order to fully protect America's inventors and authors, as well as their own."

Canada, China, Mexico, Russia and Spain made the Watch List, because of the scope and depth of their piracy problems, costing U.S. industries billions in lost revenues and jobs, and because they have not taken steps to confront the problem. These same countries were included on the 2009 Watch List, and over the last year, have made no meaningful progress to enforce intellectual property rights.

America is the largest creator, producer, and exporter of copyrighted material. In 2009, industry estimates that global piracy costs U.S. firms over \$25 billion in lost sales annually.

An explosion in piracy and a lessening of copyright protection have accompanied advances in entertainment technology. Organized crime has become heavily involved in foreign DVD and CD piracy - using the same distribution network and resources that were developed for drug trafficking and arms smuggling.

The Congressional International Anti-Piracy Caucus also highlighted the problem of websites, which are hosted overseas, that provide access to unauthorized copies of copyrighted works made by U.S. creators. China's Baidu, Canada's IsoHunt, Ukraine's mp3fiesta, **Germany's RapidShare**, Luxembourg's RMX4U.com and Sweden's The Pirate Bay were identified as priority sites. These sites are among the most heavily visited websites worldwide.

**Formed in 2003, the Congressional International Anti-Piracy Caucus is made up of 70 members of Congress with the goal of providing and highlighting international intellectual property protection and piracy.**

###



FOR IMMEDIATE RELEASE

May 19, 2010

**Contact:**

Jonathan Lamy  
Cara Duckworth  
Liz Kennedy  
202/775-0101

## RIAA JOINS CONGRESSIONAL CAUCUS IN UNVEILING FIRST-EVER LIST OF NOTORIOUS ILLEGAL SITES

### ***Baidu, Pirate Bay At Top of List***

WASHINGTON – Recording Industry Association of America (RIAA) Chairman & CEO Mitch Bainwol today joined Congressional members of the International Anti-Piracy Caucus (IAPC) to unveil a list of countries with inadequate intellectual property protections, and, for the first time ever, six illegal websites overwhelmingly used for the global exchange of illegal movies, music and other copyrighted works.

At a morning Capitol Hill news conference, IAPC Co-Chairmen Senators Sheldon Whitehouse (D-RI) and Orrin Hatch (R-Utah) and Congressmen Adam Schiff (D-Cal.) and Bob Goodlatte (R-Va.) named China, Russia, Mexico, Canada and Spain as “Top Priority Countries” with lax intellectual property enforcement. China’s Baidu, Canada’s IsoHunt, Ukraine’s mp3fiesta, Germany’s RapidShare, Luxembourg’s RMX4U.com and Sweden’s The Pirate Bay were identified as the priority sites.

These websites and services are primarily used for the illegal exchange of copyrighted works, undercutting the ability of legitimate services to compete and thrive in the global marketplace, and displacing thousands of jobs that rely on the global protection of copyright. One study commissioned by the International Intellectual Property Alliance (IIPA) concluded that more than 11 million workers are employed by copyright-related industries in the United States.

"The release of this report casts a damning spotlight once again on several nations with lax copyright protections and websites that brazenly traffic in copyright theft," said Mitch Bainwol, Chairman and CEO, RIAA. "I'm particularly struck by the IAPC decision to identify significant global websites that facilitate massive theft; theft that destroys jobs and cuts short the dreams of creators who find it more difficult to attract the capital they need to build their careers."

"Just last week, five years after the 9-0 Supreme Court landmark decision against Grokster, we saw a federal judge rule against the most significant theft machine in this country – LimeWire. While it took some time for the judicial process to work, we did see that in a nation of laws, those who set up elegant schemes to profit from theft will be stopped. There is basic accountability, although much work needs to be done to achieve a fully accountable Internet space."

"The global challenge in the years to come will be to win the battle for a civilized Internet that respects property, privacy and security. An Internet of chaos may meet a utopian vision but surely undermines the societal values of safe and secure families and job and revenue-creating commerce. Shining the spotlight on these websites sends a vital message to users, advertisers, payment processors and governments around the world."

"We congratulate the work of the IAPC and in particular its co-chairs, Senators Whitehouse and Hatch, and Congressmen Schiff and Goodlatte, for their leadership and invaluable hard work."

In some respects, one particular site, Baidu, might be the most egregious site named today. The Chinese company is publicly-traded and its search engine is one of the most popular features, providing quick and prioritized links to illegal free copies of pre-release or current-release music. Various estimates suggest Baidu is responsible for distributing around 50 percent of the unauthorized online music content in China. Baidu's own disclosures to the Securities and Exchange Commission (SEC) reflect its knowledge that its dedicated music service is dependent upon providing links to illegal content. As one disclosure stated:

*"A significant portion of our traffic is generated by users of our MP3 search service. According to Alexa.com, 16% of our traffic went to mp3.baidu.com, our MP3 search platform, as of March 31, 2006. Should we face (as a result of the foregoing considerations or otherwise) a need or decision to substantially modify, limit, or terminate our MP3 search service, our business, financial condition or results of operations could be materially and adversely affected."*

The other websites also certainly earned the dubious distinction of being identified, and reflect the evolving nature of global copyright theft. The Pirate Bay advertises its intent in its name, and remains operational notwithstanding the criminal judgment against it in Sweden. Ukraine's MP3fiesta maintains an unlicensed pay-per-download site in the style of the now shuttered allofmp3.com; the site stores and charges for content and claims licenses from societies that clearly lack authority to grant them. And Rmx4u.com, Canada's isoHunt and RapidShare are all leading sources of illegal music and operate with the clear purpose of encouraging and inducing theft.

#####

*The Recording Industry Association of America is the trade group that represents the U.S. recording industry. Its mission is to foster a business and legal climate that supports and promotes our members' creative and financial vitality. Its members are the record companies that comprise the most vibrant national music industry in the world. RIAA® members create, manufacture and/or distribute approximately 90% of all legitimate sound recordings produced and sold in the United States. In support of this mission, the RIAA works to protect intellectual property rights worldwide and the First Amendment rights of artists; conducts consumer, industry and technical research; and monitors and reviews state and federal laws, regulations and policies. The RIAA® also certifies Gold®, Platinum®, Multi-Platinum™, and Diamond sales awards, as well as Los Premios De Oro y Platino™, an award celebrating Latin music sales.*



# Exhibit 2

**Subject:** DMCA notice

**From:** Norman Z <normanz@earthlink.net>

**Date:** Tue, 01 Jun 2010 19:16:29 -0700

**To:** abuse@rapidshare.com

June 1, 2010

The following is a DMCA notice.

Please be advised that RapidShare has no right to copy, display, distribute, or offer for sale any Perfect 10 copyrighted work ("P10 Image."). Attached please find a list of 662 RapidShare download links found on [/rapidshare.com/](#) or [/rapidshare.de/](#). These links have allowed Perfect 10 to download more than 26,000 P10 Images from RapidShare. Please take all steps necessary to ensure that all of the attached links are permanently disabled, and that none of the 26,000 P10 Images that were available at these locations are ever available at any other location on RapidShare's servers. Also, please prevent every one of the 26,000 P10 Images previously available at the above loctions from being copied, displayed, distributed, or offered for sale by RapidShare in the future.

If RapidShare did not itself upload the P10 Images associated with the attached links to RapidShare's servers, please provide me by June 11, 2010, with the name, address, and phone number of the person or entity that uploaded each of these P10 Images. If you do not provide me with this information by June 11, 2010, Perfect 10 will assume that RapidShare itself uploaded these P10 Images to RapidShare's servers.

Most or all of the P10 Images that are the subject of this DMCA notice are found on Perfect 10's website, [/\\_perfect10.com.\\_/](#). Perfect 10 owns the copyright to every image on [perfect10.com](#). Please let me know if RapidShare would like to receive a free user name and password to [/perfect10.com/](#). The images on found on [/perfect10.com/](#) are arranged alphabetically by the model's first name. For example, if you are looking for Perfect 10 copyrighted images of Marisa Miller, you would first look under the letter "M" for Marisa, and then for the name Marisa Miller.

I have a good faith belief that the use of the Perfect 10 copyrighted material in the manner complained of in this DMCA notice is not authorized by the copyright holder Perfect 10, its agent, or the law. The information in this notification is accurate. I swear under penalty of perjury that I am authorized to act on behalf of Perfect 10, Inc. the owner of the exclusive rights in the material which is being infringed.

Please contact me at your earliest opportunity if you have any questions at all about this notice. If I do not hear from you, I will assume that RapidShare agrees that this notice complies with the notice provisions of the DMCA.

Sincerely,

//Norm Zada, Ph.D./.

310-205-9988

[normanz@earthlink.net](mailto:normanz@earthlink.net)

**list of P10 downloading files.pdf**

**Content-Type:** application/pdf  
**Content-Encoding:** base64

<b>RAPIDSHARE DOWNLOAD LINK</b>
<a href="http://rapidshare.com/files/103725558/Abby_Essien.zip">http://rapidshare.com/files/103725558/Abby_Essien.zip</a>
<a href="http://rapidshare.com/files/103725982/Adele_Stephens.zip">http://rapidshare.com/files/103725982/Adele_Stephens.zip</a>
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**Subject:** DMCA Notice

**From:** Norman Z <normanz@earthlink.net>

**Date:** Wed, 09 Jun 2010 19:54:51 -0700

**To:** RapidShare AG - Abuse Team <abuse@rapidshare.com>

June 9, 2010

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Sincerely,

//Norm Zada, Ph.D//

310-205-9988

[normanz@earthlink.net](mailto:normanz@earthlink.net)

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**Subject:** DMCA Notice

**From:** Norman Z <normanz@earthlink.net>

**Date:** Fri, 11 Jun 2010 00:43:20 -0700

**To:** RapidShare AG - Abuse Team <abuse@rapidshare.com>

June 11, 2010

The following is a DMCA notice.

Please be advised that RapidShare has no right to copy, display, distribute, or offer for sale any Perfect 10 copyrighted work ("P10 Image."). Attached please find a list of approximately 650 RapidShare download links. These links have allowed Perfect 10 to download thousands of P10 Images from RapidShare. Please take all steps necessary to ensure that all of the attached links are permanently disabled, and that none of the P10 Images that were available at these locations are ever available at any other location on RapidShare's servers. Also, please prevent every one of the P10 Images previously available at the above locations from being copied, displayed, distributed, or offered for sale by RapidShare in the future.

If RapidShare did not itself upload the P10 Images associated with the attached links to RapidShare's servers, please provide me by June 16, 2010, with the name, address, and phone number of the person or entity that uploaded each of these P10 Images. If you do not provide me with this information by June 16, 2010, Perfect 10 will assume that RapidShare itself uploaded these P10 Images to RapidShare's servers.

Most or all of the P10 Images that are the subject of this DMCA notice are found on Perfect 10's website,/\_perfect10.com.\_/ Perfect 10 owns the copyright to every image on perfect10.com. The images on found on /perfect10.com/ are arranged alphabetically by the model's first name. For example, if you are looking for Perfect 10 copyrighted images of Marisa Miller, you would first look under the letter "M" for Marisa, and then for the name Marisa Miller.

I have a good faith belief that the use of the Perfect 10 copyrighted material in the manner complained of in this DMCA notice is not authorized by the copyright holder Perfect 10, its agent, or the law. The information in this notification is accurate. I swear under penalty of perjury that I am authorized to act on behalf of Perfect 10, Inc. the owner of the exclusive rights in the material which is being infringed.

Please contact me at your earliest opportunity if you have any questions at all about this notice. If I do not hear from you, I will assume that RapidShare agrees that this notice complies with the notice provisions of the DMCA.

Sincerely,

//Norm Zada, Ph.D//

310-205-9988

[normanz@earthlink.net](mailto:normanz@earthlink.net)

**P10 Infringing Link List 3.pdf**

**Content-Type:** application/pdf

**Content-Encoding:** base64

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<a href="http://rapidshare.com/files/106301711/Olga_Dominguez.zip">http://rapidshare.com/files/106301711/Olga_Dominguez.zip</a>
<a href="http://rapidshare.com/files/106303004/Olga_Nekorkina.zip">http://rapidshare.com/files/106303004/Olga_Nekorkina.zip</a>
<a href="http://rapidshare.com/files/106303234/Olga_Romanushka.zip">http://rapidshare.com/files/106303234/Olga_Romanushka.zip</a>
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**Subject:** DMCA Notice

**From:** Norman Z <normanz@earthlink.net>

**Date:** Sun, 13 Jun 2010 09:51:54 -0700

**To:** RapidShare AG - Abuse Team <abuse@rapidshare.com>

June 13, 2010

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Sincerely,

//Norm Zada, Ph.D//

310-205-9988

[normanz@earthlink.net](mailto:normanz@earthlink.net)

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